

**From:** [Haynes, Diana - AMS](#)  
**To:** [Hrdy, David](#)  
**Subject:** Foreign Use Pesticides  
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Hi David,

As you know, since 2012, we've been trying to put "foreign use" pesticides into PDP – mostly in response to the OIG audit that recommended EPA, FDA and USDA work to do this.

Primarily, we've been using FDA intel of late to determine what to add – based on what FDA is seeing in imports. These may or may not have a U.S. tolerance.

If they are not registered in the U.S. and aren't going to be, what will EPA do with that data?

I am working with Sitra, one of our new chemists, to put together an update for the April meeting. She asked me this question and I was not entirely sure. I know how the data WITH registrations will be used. Will the no tolerance data be put into an associated cumulative risk cup? Other?

Thanks,  
Diana

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